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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC.; a Colorado corporation; ORACLE AMERICA, INC.; a Delaware corporation; and ORACLE INTERNATIONAL CORPORATION, a California corporation, 　　　　Plaintiffs, 　　v. RIMINI STREET, INC., a Nevada corporation; and SETH RAVIN, an individual, 　　　　Defendants.	**Case No. 2:10-cv-0106-LRH-VCF** **DECLARATION OF JENNA K. STOKES IN SUPPORT OF ORACLE'S REPLY IN SUPPORT OF MOTION TO COMPEL RE POST-INJUNCTION REQUESTS FOR PRODUCTION** **PUBLIC REDACTED VERSION**

1   I, Jenna K. Stokes, declare as follows:

2   1.   I am an associate at Morgan, Lewis & Bockius LLP, counsel of record for

3   Plaintiffs Oracle USA, Inc., Oracle America, Inc. and Oracle International Corporation

4   (collectively "Oracle") in this action. I have personal knowledge of the facts stated below and

5   could and would testify to them if called upon to do so.

6   2.   Attached to this Declaration as Exhibit 1 is a true and correct copy of a November

7   2, 2018 e-mail from a Rimini employee to Rimini developers, accessed via Rimini's online

8   development-tracking system, Jira, in connection with █████████████████ .

9   3.   Attached to this Declaration as Exhibit 2 is a true and correct copy of the first 25

10   lines of w2box.sqc from ORCLRS0046475, PeopleSoft HRMS 9.0.

11   4.   Attached to this Declaration as Exhibit 3 is a true and correct copy of a February

12   15, 2014 email from Seth Ravin to Rimini employees titled "█████████████████████

13   █████ ," Exhibit 1351 to the December 1, 2017 deposition of Brian Slepko in *Rimini II*.

14   5.   Attached to this Declaration as Exhibit 4 is a true and correct copy of a letter from

15   David R. Kocan to Eric D. Vandevelde, dated August 28, 2019, in which Oracle describes ██

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18   ████ indicating deletion of relevant evidence.

19   6.   Attached to this Declaration as Exhibit 5 is a true and correct copy of a letter from

20   Eric D. Vandevelde to David R. Kocan, dated August 28, 2019, responding to Oracle's letter

21   regarding ████████████████████████████ .

22   7.   Attached to this Declaration as Exhibit 6 is a true and correct copy of an August

23   27–28, 2019 email exchange between Jennafer Tryck and me in which Rimini responded to

24   Oracle's request that Rimini "[p]lease identify, by Bates number and Fix ID, all complete updates

25   that Rimini has produced" by stating that "Rimini produced as part of Production 5 software

26   updates created after November 5, 2018 and provided to clients, to the extent they exist on

27   Rimini's systems." Rimini refused to state whether Rimini produced any complete updates and

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IN SUPPORT OF MOTION TO COMPEL

1 provided no Bates numbers or Fix IDs. Rimini pointed to a production of over 80,000 documents

2 that constitutes nearly the entire production to date.

3   8.   Attached to this Declaration as Exhibit 7 is a true and correct copy of a document

4 produced by Rimini in *Rimini II*, endorsed with Bates number RSI006850039.

5   9.   Rimini identified ▮▮▮ distributions of software updates to customers in the time

6 period between January and May 2019 in Exhibit D to its Supplemental Response to

7 Interrogatory No. 9 in Rimini's First Supplemental Responses to Oracle's Supplemental

8 Interrogatories. Oracle will make the 143-page document available to the Court upon request.

9   I declare under penalty of perjury under the laws of the United States that the foregoing is

10 true and correct and that this declaration is executed at San Francisco, California, on August 29,

11 2019.

12 Dated: August 29, 2019

                                                /s/ Jenna K. Stokes

13   Jenna K. Stokes

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15   Attorneys for Plaintiffs Oracle USA, Inc., Oracle
                                   America, Inc. and Oracle International

16   Corporation

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IN SUPPORT OF MOTION TO COMPEL